

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	Case No. 23-08514
)	Honorable A. Benjamin Goldgar
Rais Uddin,)	
Bijal A. Brahmabhatt,)	Chapter 13
)	
)	
Debtors.)	

OBJECTION TO CONFIRMATION OF PLAN

COMES NOW TD Bank, N.A., successor in interest to TD Auto Finance LLC ("TD Bank"), a creditor in this case and objects to confirmation of the Plan filed by Debtors, on the following grounds:

1. TD Bank is a creditor of a Debtors with respect to a debt secured by a 2016 Ford Fusion.
2. Part 3.1 of Debtors' Plan provides for TD Bank to be paid directly.
3. However, the Plan does not provide for curing the prepetition arrears in the amount of \$3,094.53.
4. If the Debtors are to pay said arrears directly, then the language in part 8.1 needs to be adjusted to make it clear that the Debtors are the disbursing agent for both the pre-petition as well as the post-petition payments. Otherwise, the Plan would need to provide for the payment of the arrears, with interest and a prompt cure.

WHEREFORE, TD Bank respectfully requests that confirmation of the Plan be denied, and for such further relief as is just and proper.

Respectfully submitted,
RIEZMAN BERGER, P.C.

By: /s/ Kathryn A. Klein
Kathryn A. Klein, #06199235
7700 Bonhomme Avenue, 7th Floor
St. Louis, Missouri 63105
(314) 727-0101 phone
(314) 727-1086 fax
klein@riezmanberger.com
Attorney for TD Bank

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was electronically served using the CM/ECF system to the following on August 15, 2023:

Justin R. Storer
105 W. Madison St., Suite 1500
Chicago IL 60602

Attorney for Debtors

Marilyn O. Marshall
224 South Michigan Ste 800
Chicago IL 60604

Chapter 13 Trustee

Office of the United States Trustee
219 S Dearborn St, Room 873
Chicago, IL 60604

I further certify that a copy of the foregoing document was served on the following parties by sending postage prepaid, in the United States Mail, by first-class mail to the following on August 15, 2023:

Rais Uddin
Bijal A. Brahmhatt
1128 Aintree Pl.
Schaumburg IL 60194

Debtors

/s/ Kathryn A. Klein